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6 *Attorneys for Jeffrey J. Judd*

7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE DISTRICT OF NEVADA**

9 SECURITIES AND EXCHANGE  
COMMISSION,

10 Plaintiff,

11 v.

12 MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
13 CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
14 Corporation; J&J CONSULTING  
SERVICES, INC., a Nevada Corporation; J  
15 AND J PURCHASING LLC; SHANE M.  
JAGER; JASON M. JONGEWARD;  
16 DENNY SEYBERT; and ROLAND  
TANNER;

17 Defendants,

18 THE JUDD IRREVOCABLE ; PAJ  
CONSULTING INC; BJ HOLDINGS LLC;  
19 STIRLING CONSULTING, L.L.C.; CJ  
INVESTMENTS, LLC; JL2  
20 INVESTMENTS, LLC; ROCKING HORSE  
PROPERTIES, LLC; TRIPLE THREAT  
21 BASKETBALL, LLC; ACAC LLC;  
ANTHONY MICHAEL ALBERTO, JR.; and  
22 MONTY CREW LLC;

23 Relief Defendants.  
24  
25

Case No. 2:22-cv-0612-JCM-EJY

**RESPONSE TO MOTION TO PERMIT  
APPEARANCE OF GOVERNMENT  
ATTORNEY**

Defendant Jeffrey J. Judd notes that government attorney Joni Ostler was a primary fact witness whose declarations formed the factual basis for the Court’s issuance of the *Temporary Restraining Order and Orders: (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting the Destruction of Documents; and (4) Granting Expedited Discovery; and (5) Order to Show Cause Re Preliminary Hearing* (Dkt. No. 3) and the *Order Entering Preliminary Injunction, Asset Freeze, and Other Equitable Relief* (Dkt. No. 56). Ms. Ostler previously testified that she “participat[ed] in fact-finding inquiries and . . . actively investigated” and thereby had “personal knowledge” of the matters at issue here. (Dkt. No. 2-5 at ¶¶ 3-4) The government cannot shield her investigation from discovery via her appearance. Any claim of privilege to the factual basis of her declarations has been effectively waived.

DATED this 2<sup>nd</sup> day of May, 2022.

/s/ Kevin N. Anderson

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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 2nd day of May, 2022, I caused a copy of the foregoing to be served via e-mail or the United States Mail, with first-class postage prepaid, on the following as indicated as follows:

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7 **Via U.S. Mail**

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12 *Defendant*

13 J&J Consulting Services, Inc., an Alaska corporation  
14 c/o Northwest Registered Agent, Inc., Registered Agent  
15 125 North Willow Street, Suite B  
16 Kenai, Alaska 99611  
17 *Defendant*

18 J&J Consulting Services, Inc., a Nevada corporation  
19 J and J Purchasing LLC  
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corporation & J and J Purchasing LLC*

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*Defendant*

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*Defendant*

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*Relief Defendant*

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*Relief Defendant*

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*Relief Defendant*

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*Relief Defendant*

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*Relief Defendant*

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c/o BD & Associates CPAS PLLC, Reg. Agent  
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*Relief Defendant*

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2 c/o Holley Driggs, Ltd., Reg. Agent  
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4 400 South Fourth Street Third Fl.  
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6 *Relief Defendant*

7 Anthony Michael Alberto, Jr.  
8 12018 Portamento Court  
9 Las Vegas, Nevada 89138-0610  
10 *Relief Defendant*

11 Monty Crew LLC  
12 c/o Evans & Associates, Former Reg. Agent  
13 Attn. Shannon L. Evans  
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15 Las Vegas, NV 89117  
16 2648 South Mole Street  
17 Philadelphia, PA 19145-4608  
18 *Relief Defendant*

19 DATED this 2nd day of May, 2022.

20 /s/ Kevin N. Anderson  
21 KEVIN N. ANDERSON, ESQ.  
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24  
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